



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM:SK
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

August 29, 2014

By FedEx & ECF

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Re: United States v. Philip Kenner & Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014 and August 28, 2014. The government renews its request for reciprocal discovery.

Enclosed please find the following:

- Records obtained from Alliance Bank (bates-numbered BNK-AB 1736-2493);
- Records obtained from City National Bank (bates-numbered BNK-CNB 1-74);
- Records obtained from International Bank (bates-numbered BNK-IB 66-228);

- Records obtained from Johnson Bank (bates-numbered BNK-JB 2435-2452);
- Records obtained from TD Bank (bates-numbered BNK-TD 1-1409);
- Records obtained from Fidelity National Title Insurance Company (bates-numbered FN-Title 265-3855);
- Records pertaining to Baja Development Corporation and Diamante Del Mar (bates-numbered DIAMANTE 1-2242);
- Records pertaining to Windwalker Real Estate (bates-numbered WW 1-1138);
- Records pertaining to Neptune Company (bates-numbered NEP DISK 1-4);
- Materials recovered during the execution of a search warrant at Kenner's home in Scottsdale, Arizona on November 13, 2013 (bates-numbered PKHome 14524-17316); and
- Recorded calls with Kenner (bates-numbered KREC 7-9).

In response to your letter dated June 25, 2014, the government encloses several documents that, among others, are documents containing forged signatures (bates-numbered DOC 1-14). The government will identify additional such documents as they become known and available.

The government will continue to provide discovery. Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)